

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF INTEGRATED
RESOURCE PLANNING FOR THE
PROVISION OF STANDARD OFFER
SERVICE BY DELMARVA POWER &
LIGHT COMPANY UNDER DEL. C.
§ 1007(C) & (D)

PSC DOCKET NO. 14-0559

**PETITION OF THE MID-ATLANTIC RENEWABLE
ENERGY COALITION FOR LEAVE TO INTERVENE OUT-OF-TIME**

Pursuant to Rule 21 of the Rules of Practice and Procedure of the Delaware Public Service Commission (26 DEL. ADMIN. CODE § 1001-2.9), the Mid-Atlantic Renewable Energy Coalition (“MAREC”) hereby petitions the Commission for leave to intervene out-of-time in the above-captioned matter. In support of its petition for leave to intervene, MAREC states the following:

1. MAREC is a nonprofit coalition of wind energy companies, wind turbine manufacturers, public interest organizations, law firms, and service companies dedicated to promoting the growth and development of renewable energy, enhancing energy security, improving the environment, and boosting economic development in the Mid-Atlantic region. Primarily, MAREC works with state regulators to develop rules and supportive policies for renewable energy; provides education and expertise on the environmental sustainability of wind energy; and offers technical expertise and advice on integrating variable wind energy resources into the electric grid.

2. On December 2, 2014, Delmarva Power & Light Company (“Delmarva”) filed with the Commission its proposed Integrated Resource Plan (“IRP”), Docket 14-0559.

3. Delmarva Power & Light Company seeks approval of its 2014 IRP. The docket involves policy issues of interest to MAREC, specifically issues pertaining to renewable energy. The IRP includes discussion and analysis of renewable energy, energy efficiency, environmental impacts, and externality benefits – topics involving MAREC’s goal of expanding renewable energy development in the Mid-Atlantic region.

4. MAREC has a substantial interest in this matter that is not adequately represented by the other parties in this proceeding. MAREC and its members are committed to significant growth in renewable energy technologies to support economic development in the region and helping to meet the aggressive legislative mandate for renewable energy through Delaware’s renewable portfolio standard. MAREC is in the position of providing its experienced position on Delmarva’s long-term planning as it relates to renewables. No other participant in this proceeding has the same obligation to promote the development of clean energy resources in Delaware.

5. Additionally, MAREC’s participation in the proceeding will be in the public interest. MAREC works with policymakers, the public, businesses, educators and public interest organizations to achieve its goal of expanding renewable energy development in Delaware and areas throughout the Mid-Atlantic region. MAREC has intervened in two of Delmarva’s previous IRP proposals: PSC Docket No. 10-2 and PSC Docket No. 12-544.

6. Further, several of MAREC’s members are directly affected by the issues raised in this proceeding and may be affected by issues raised by other parties in the proceeding. The interests of MAREC’s members may not be fully developed if MAREC is not permitted leave to intervene.

7. The Commission set February 23, 2015, as the deadline for filing petitions to intervene. While MAREC submits this Petition to Intervene two weeks outside of the stated deadline, no party will be prejudiced by this insignificant delay. Indeed, MAREC suspects that there will be very limited movement in this matter until March 30, 2015, the date on which comments are due pursuant to the Commission's Order No. 8694, dated December 16, 2014. MAREC believes that there is good cause shown, especially in light of the pending merger application of Delmarva with Exelon Corporation and the significant potential impacts on renewable energy policy as a result of the potential merger. As indicated, no other party can adequately represent the interests of MAREC and its members in this proceeding.

8. MAREC respectfully requests that it be served with copies of all filings and pleadings in this matter. Pursuant to Rule 21(i) (26 DEL. ADMIN. CODE § 1001-2.9.1.1) of the Commission's Rules of Practice and Procedure, MAREC's contact information is as follows:

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9. For the foregoing reasons, MAREC respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes.

Respectfully submitted,

WOMBLE CARLYLE SANDRIDGE & RICE, LLP

/s/ Jill Agro

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*Attorney for the Mid-Atlantic Renewable
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Dated: March 9, 2015

CERTIFICATE OF SERVICE

I certify that on March 9, 2015, I filed the attached *Petition of the Mid-Atlantic Renewable Energy Coalition for Leave to Intervene Out-of-Time* with the Public Service Commission.

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